

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

BOBBY MORRIS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SONIC INDUSTRIES SERVICES, LLC,

Defendant.

Case No. 4:25-cv-00035-SRC

Hon. Stephen R. Clark

DEFENDANT’S MOTION TO DISMISS PLAINTIFF’S FIRST AMENDED COMPLAINT

Defendant Sonic Industries Services, LLC (“Defendant”), by and through its undersigned counsel, hereby respectfully moves to dismiss the first amended putative class action Complaint (*see* Dkt. 11) filed by Plaintiff Bobby Morris in the above-captioned matter, in its entirety, pursuant to Fed. R. Civ. P. 12(b)(1) for lack of standing under Article III of the United States Constitution, and Fed. R. Civ. P. 12(b)(6) for failure to state a claim for relief. The specific bases for this Motion are set forth in Defendant’s Memorandum of Law, filed concurrently herewith and incorporated herein by reference.

WHEREFORE, for the reasons provided in its Memorandum of Law, and for such other reasons as may be presented to the Court prior to ruling hereon, Defendant respectfully requests that this Court enter an order dismissing Plaintiff’s entire First Amended Complaint with prejudice, and granting all other just relief.

Dated: April 2, 2025

Respectfully submitted,

By: /s/ A. Paul Heeringa

A. Paul Heeringa (Bar # 6288233IL)
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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on, April 2, 2025, a true copy of the foregoing was filed electronically using the Court's CM/ECF system, to be served via operation of the Court's electronic filing system upon all counsel of record.

/s/ A. Paul Heeringa

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